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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

* * *

2:05-cr-0022-LDG

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 GRAHAM THOMAS WILSON,
15 Defendant.

**MOTION FOR EARLY TERMINATION
OF SUPERVISED RELEASE**

(Expedited Treatment Requested)

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17 COMES NOW, The defendant, GRAHAM THOMAS WILSON, by and through his
18 counsel, Brenda Weksler, Assistant Federal Public Defender, files this Motion for Early Termination
19 of Supervised Release. This request is based upon the following points and authorities.

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21 DATED this 24th day of March, 2010.

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23 Respectfully Submitted,

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25 FRANNY A. FORSMAN
Federal Public Defender

26 /s/ Brenda Weksler

27 BRENDA WEKSLER
28 Assistant Federal Public Defender

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POINTS AND AUTHORITIES

MEMORANDUM OF POINTS AND AUTHORITIES

On April 21, 2006, GRAHAM WILSON, (hereinafter Mr. Wilson), plead guilty to Felon in Possession of a Firearm, a violation of 18 U.S.C. § 922(g)(1). On August 11, 2006, Mr. Wilson was sentenced to a term of 32 months in custody with thirty-six months supervised release to follow. He commenced his supervision on May 22, 2008. Mr. Wilson has been under supervision for almost two years. United States Probation Officer Leo Sanchez used to supervise Mr. Wilson. Currently, United States Probation Officer Joy Gabonia is supervising Mr. Wilson. Ms. Gabonia indicates that Mr. Wilson has had no problems while on supervision.¹ As a result, Mr. Wilson is requesting that this Court terminate his supervised release pursuant to 18 U.S.C. 3583(e)(1). The Department of Probation takes no position on the issue.

As mentioned above, Mr. Wilson is in compliance with all of the conditions of supervised release. Mr. Wilson has no obligations outstanding. He has done all that has been asked of him by the United States Probation Office. Mr. Wilson is not currently receiving any services from the United States Probation Office that would warrant his being supervised for another year. In speaking to Ms. Gabonia, it appears that the last two times that Mr. Wilson has been asked to report to the Office of Probation were November 18, 2009 and March 16, 2010. The 4-month gap between reporting requirements indicates that probation is confident Mr. Wilson is doing what he is supposed to be doing. Mr. Wilson has maintained a positive attitude and respect of the law during his period of supervised release. Lastly, Mr. Wilson is currently employed and has prospects for additional work in the future. *See* Exhibit A (Letter from St. Paul indicating his employment; Letter from Purgatory Fence Co. indicating plans for future employment; and identification cards showing union membership). Therefore, due to Mr. Wilson's exemplary conduct during his term of supervised release, and in the interest of justice early termination is justified in this case.

¹ Ms. Gabonia explained that during what is almost two years on supervision Mr. Graham only missed one drug test. He was ordered to do community service and completed that requirement.

CONCLUSION

For the aforementioned reasons, Mr. Wilson respectfully request this Court terminate his period of supervised release pursuant to Title 18 U.S.C. 3583(e)(1).

Dated this 24th day of March, 2010.

Respectfully submitted,

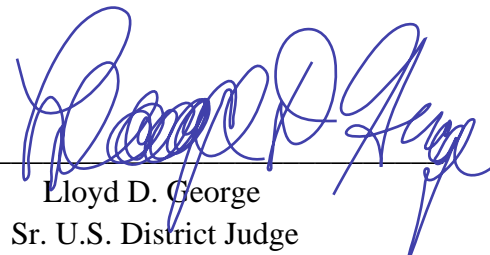
/s/ Brenda Weksler

By: BRENDA WEKSLER
Assistant Federal Public Defender

ORDER

IT IS SO ORDERED that Defendant is GRANTED early termination of supervised release as of August 18, 2010.

DATED this 27 day of August, 2010.



Lloyd D. George
Sr. U.S. District Judge